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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

EKATERINA ALEKSANDROVNA LAU,

Defendant.

Case No.: 2:23-CR-200-GMN-MDC

Stipulation for a Protective Order

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the defendant, Ekaterina Aleksandrovna Lau, the public, or any third party not directly related to this case, any and all unredacted discovery (the "Protected Material") in this case. The parties state as follows:

1. On October 25, 2023, a Federal Grand Jury returned an Indictment charging Lau with one count of Interference with Flight Crew Members and Attendants in violation of 49 U.S.C. § 46504, and one count of Assault by Striking or Wounding in violation of 18 U.S.C. § 113(a)(4) for her actions aboard an airliner in flight.¹

2. On January 22, 2024, the defendant filed a Notice of Insanity Defense.²

¹ ECF # 1

² ECF # 17

1 3. On February 20, 2024, the defendant filed a Motion for Competency
2 Evaluation.³

3 4. On February 23, 2024, the defendant filed a Motion to Compel Discovery.⁴

4 5. The trial date is currently set for April 22, 2024.

5 6. In order to prevent dissemination of the Protected Material, the parties intend to
6 restrict access to the Protected Material in this case to the following individuals: attorneys for
7 all parties and any personnel that the attorneys for all parties consider necessary to assist in
8 performing the attorneys' duties in the prosecution or defense of this case, including
9 investigators, paralegals, experts, support staff, interpreters, and any other individuals
10 specifically authorized by the Court (collectively, the "Covered Individuals"). The defendant,
11 Ekaterina Aleksandrovna Lau, shall not obtain a copy of the Protected Material. The defendant
12 may, however, review the Protected Material in the presence of his attorney.

13 7. Without leave of Court, the Covered Individuals shall not:

14 a. make copies for, or allow copies of any kind to be made by any other
15 person of the Protected Material in this case or permit dissemination of the Protected
16 Material, to include leaving a copy of the Protected Material with the defendant unattended;

17 b. allow any other person to watch, listen, or otherwise review the Protected
18 Material;

19 c. use the Protected Material for any other purpose other than preparing to
20 defend against or prosecute the charges in the indictment or any superseding indictment
21 arising out of this case; or
22

23
24 ³ ECF # 19

⁴ ECF # 22

d. attach the Protected Material to any of the pleadings, briefs, or other court filings except to the extent those pleadings, briefs, or filings are filed under seal.

8. Nothing in this stipulation is intended to restrict the parties' use or introduction of the Protected Material as evidence at trial or support in motion practice. If the defendant proceeds to trial or any evidentiary hearing, the parties will confer to determine whether the terms of this stipulation should be revisited.

9. The parties shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.


10. The defendant hereby stipulates to this protective order.

DATED March 5, 2024.

Respectfully submitted,

For the United States:

JASON FRIERSON
United States Attorney


ROBERT KNIEF
Assistant United States Attorney

For the Defense:

/s/ Nicholas Wooldridge
NICHOLAS WOOLDRIDGE
Attorney for Ekaterina Aleksandrovna Lau

FOR GOOD CAUSE SHOWN, IT IS SO ORDERED:

Date: March 7, 2024


HONORABLE MAXIMILIANO D. COUVILLIER, III
United States Magistrate Judge